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August 20, 2024

Via Email: LimanNYSDChambers@nysd.uscourts.gov

Honorable Lewis J. Liman
United States District Court
500 Pearl Street, Room 1620
Southern District of New York
New York, NY 10007

**RE: *Daniel Levin, Santos J. Rosario and Felicia Rosario vs.
Sarah Lawrence College, Lee C. Chen, Gumley-Haft, LLC and Scott Muller***
C.A. No. 23-cv-10236

Dear Judge Liman,

Scott Muller (“Defendant”), with the assent of Daniel Levin, Santos J. Rosario, and Felicia Rosario (collectively “Plaintiffs), by and through undersigned counsel, hereby requests a short extension of time for Defendant Muller to respond to Plaintiffs’ Complaint and Demand for Jury Trial. As grounds in support of this request, the Parties state as follows:

1. Plaintiffs served their Complaint and Demand for Jury Trial upon Scott Muller on March 25, 2024.
2. On or about June 19, 2024, Attorney Kelly Guagenty (counsel for the Plaintiffs) was contacted by the undersigned, Attorney David Kaplan (counsel for Defendant Muller). During that communication, Attorney Kaplan reported that he was newly retained by his client. The Parties have been in regular communication and now request an additional 45 days for Defendant Muller to file his responsive pleading.
3. Enlargements of time are permitted with good cause by Federal Rule of Civil Procedure 6(b). Such enlargements of time should be liberally granted absent a showing of bad faith or undue prejudice. See, e.g., *Lizarazo v. Miami-Dade Corrections & Rehab. Dept.*, 878 F.3d 1008, 1012 (11th Cir. 2017) (citing *U.S. v. Miller Bros. Constr. Co.*, 505 F.2d 1031, 1035 (10th Cir. 1974)).
4. No party will be prejudiced by the relief sought, and the relief is not requested for the purposes of delay.
5. This is the first extension request made by these Parties in connection with this pleading.
6. Attorney Kaplan has conferred with counsel for Sarah Lawrence College and Gumley-Haft LLC with respect to the relief sought. Counsel for Sarah Lawrence and Gumley-Haft, LLC have agreed to the above extension request.

7. Based on the foregoing, the Parties have demonstrated good cause to extend the time for Defendant Muller to respond to Plaintiffs' Complaint.

We respectfully request that this Honorable Court consider this request, and grant an extension up until September 23, 2024 for Defendant Muller to serve his responsive pleading.

Sincerely,
Counsel for Plaintiffs,

Kelly A. Guagenty

Kelly A. Guagenty, Esq.
JUSTICE LAW COLLABORATIVE, LLC

And,

Counsel for Defendant, Scott Muller,

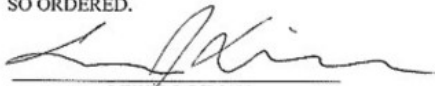
David Kaplan

David Kaplan, Esq.

cc: Thomas D'Antonio, Esq. (counsel for Sarah Lawrence College)
Kelly J. Howell, Esq. (counsel for Gumley-Haft, LLC)

Extension granted.

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

August 21, 2024